

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS, INC.	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No: 1:14-cv-14176
	)	
PRESIDENT AND FELLOWS OF HARVARD	)	
COLLEGE (HARVARD CORPORATION)	)	
	)	
Defendant.	)	
	)	

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**PLAINTIFF’S REQUEST FOR TELEPHONIC CONFERENCE**

Pursuant to Local Rule 37.1, Plaintiff Students for Fair Admissions, Inc. (“SFFA”), hereby requests this Honorable Court for a telephonic conference at the Court’s earliest convenience to address a discovery dispute that has arisen regarding the propriety of Defendant’s refusing to exchange any documents before any ruling on its pending motion for stay (Dkt # 58), filed eight weeks ago. This request is made pursuant to prior statements from the Court encouraging the parties to contact the Court by telephone to settle basic discovery matters without resort to formal motion practice.

Plaintiff contends that Defendant cannot effectively grant itself a stay, and that having failed to request a temporary stay pending the disposition of its motion, Defendant is obligated to make a good-faith effort to produce documents in the normal course. Defendant denies that it has any obligation to produce documents while its motion is pending, and that SFFA is required to file a motion to compel production to obtain any of the documents that Harvard previously indicated it would produce in this matter. Counsel for the parties have met and conferred on this issue and are at an impasse. Defendant’s counsel has further indicated it believes a telephonic

conference is unnecessary. Plaintiff's counsel is available for a telephonic conference at any time this week or next.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court schedule a telephonic conference at its earliest convenience.

Respectfully submitted,

STUDENTS FOR FAIR ADMISSIONS, INC.

By its attorneys,

Date: September 1, 2015

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**CETIFICATE OF CONFERENCE**

Pursuant to Local Rule 7.1(a)(2), counsel for Plaintiff conferred with counsel for Defendant, and the parties' positions from that conference are set forth above.

s/ Patrick Strawbridge\_\_\_\_\_

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

\_\_\_\_s/ Patrick Strawbridge\_\_\_\_\_